ProScience Analytical Services, Inc

Client #:

622

Client Project:

MEP03102

Client Reference: 7 Depot St., Windham, ME

Client Name:

Jacques Whitford Company, Inc. RI

Method:

EPA/600/R-93/116

Batch:

B 23598

Date Sampled: 12/16/2003 Date Received: 12/30/2003

Date Analyzed: 1/2/2004

Date of Report: 1/8/2004

	MARK Com			ASBESTOS CHR AMO CRO ACT TRE ANT							NO	V-ASBES	TOS	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225727	20F		0	0	0	0	0	0	0	0	0	0	0	0	0

Description Exterior Corrugated Transite

Location: N/A

Comments

Analyzed:

No

					ASBE	STOS					NON	V-ASBES	TOS		
LAB ID	Field 1D	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225728	20G		0	0	0	0	0	0	0	0	0	0	0	0	0

Description Exterior Corrugated Transite

Location: N/A

Comments

Analyzed:

No

					ASBE	STOS					NON	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225729	21A	Red	0	0	0	0	0	0	0	0	0	0	0	0	100

Description Red Window Glazing

Location: Basement

Comments

Analyzed:

Yes

					AŞBE	STOS					NON	V-ASBES	STOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225730	21B	Red	0	0	. 0	0	0	0	0	0	0	0	0	0	100

Description Red Window Glazing

Location:

Basement

Comments

Analyzed:

Yes

			ASBESTOS CHR AMO CRO ACT TRE ANT								NON	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225731	21C	Red	0	0	0	0	0	0	0	0	0	0	0	0	100

Description Red Window Glazing

Location: Basement

Comments

Analyzed:

Yes

					ASBE	STOS					NON	-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225732	22A	Ml. Clrs.	TR	0	0	0	0	0	0	0	0	0	0	10	90

Description Window Glazing/Metal Frame

Location: Basement

Comments 10% of otther is Wollastonite

Analyzed:

Yes

ProScience Analytical Services, Inc

Client #:

622

MEP03102

Batch: B 23598 Date Sampled: 12/16/2003

Client Project:

Client Reference: 7 Depot St., Windham, ME

Client Name:

Jacques Whitford Company, Inc. RI

Date Received: 12/30/2003 Date Analyzed: 1/2/2004

Method:

EPA/600/R-93/116

Date of Report: 1/8/2004

					ASBE	STOS					NON	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225733	22B	Ml. Clrs.	TR	. 0	0	0	0	0	0	0	0	0	0	5	95

Description Window Glazing/Metal Frame

Location:

Basement

Comments 5% of otther is Wollastonite

Analyzed:

Yes

					ASBE	STOS					NON	-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225734	22C	Ml. Clrs.	TR	0	0	0	0	0	0	0	0	0	0	5	95

Description Window Glazing/Metal Frame

Location:

Basement

Comments 5% of otther is Wollastonite

Analyzed:

Yes

					ASBE	STOS					NO	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225735	23A	Ml. Clrs.	0	0	0	0	0	0	0	0	0	0	0	0	100

Description Window Glazing/Large Wood Frame

Location:

Basement

Comments

Analyzed:

Yes

				S	ASBE	STOS					NON	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225736	23B	Ml. Cirs.	0	0	0	0	0	0	0	0	0	0	0	0	100

Description Window Glazing/Large Wood Frame

Location:

Basement

Comments

Analyzed:

Yes

				1000	ASBE	STOS					NON	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225737	23C	Ml. Clrs.	0	0	0	0	0	0	0	0	0	0	0	0	100

Description Window Glazing/Large Wood Frame

Location:

Basement

Comments

Analyzed:

Yes

					ASBE	STOS					NO!	V-ASBES	STOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225738	24A	Ml. Clrs.	3	0	0	0	0	0	0	0	0	0	0	0	97

Description Window Glazing/Small Wood Frame

Location: Basement

Comments

Analyzed:

ProScience Analytical Services, Inc.

Client #:

622

Client Project:

MEP03102

Client Reference: 7 Depot St., Windham, ME

Client Name:

Jacques Whitford Company, Inc. RI

Method:

EPA/600/R-93/116

Batch:

B 23598

Date Sampled: 12/16/2003

Date Received: 12/30/2003

Date Analyzed: 1/2/2004

ate	ot	Report:	1/8/2004	

					ASBE	STOS					NON	V-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225739	24B		0.	. 0	0	0	0	0	0	0	0	0	0	0	0

Description Window Glazing/Small Wood Frame

Location: Basement

Comments

Analyzed:

				***	ASBE	STOS					NON	-ASBES	TOS		
LAB ID	Field ID	Color	CHR	AMO	CRO	ACT	TRE	ANT	FBG	MNW	CEL	HAR	SYN	ОТН	NON
B225740	24C		0	0	0	0	0	0	0	0	0	0	0	0	0

Description Window Glazing/Small Wood Frame

Location:

Comments

Analyzed:

No

Asbestos Codes:

CHR = Chrysotile AMO = Amosite

CRO = Crocidolite ACT = Actinolite

TRE = Tremolite ANT = Anthophyllite

Non-Asbestos Codes: FBG = Fiberglass MNW = Mineral Wool

CEL = Cellulose

HAR = Hair

SYN = Synthetic OTH = Other NON = Non-Fibrous Minerals

All results are in percentage.

Stefanie Bishop, Analyst

VIL_RESP00857

APPENDIX B

Charts of ACM Results

Sample # /Description	Material Location	Approximate Quantity	Observed Condition	Total Asbestos Content/Make-up
1A White 12" x 12" Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 90% Cellulose 10% Non-Fibrous
1B White 12" x 12" Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 90% Cellulose 10% Non-Fibrous
1C White 12" x 12" Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 90% Cellulose 10% Non-Fibrous
2A 2' x 4' Worm Pattern Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 45% Mineral Wool 45% Cellulose 10% Non-Fibrous
2B 2' x 4' Worm Pattern Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 45% Mineral Wool 45% Cellulose 10% Non-Fibrous
2C 2' x 4' Worm Pattern Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 45% Mineral Wool 45% Cellulose 10% Non-Fibrous
2D 2' x 4' Worm Pattern Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 45% Mineral Wool 45% Cellulose 10% Non-Fibrous
2E 2' x 4' Worm Pattern Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 45% Mineral Wool 45% Cellulose 10% Non-Fibrous
3A Solid White 2' x 2' Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 90% Cellulose 10% Non-Fibrous

Sample # /Description	Material Location	Approximate Quantity	Observed Condition	Total Asbestos Content/Make-up
3B Solid White 2' x 2' Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 90% Cellulose 10% Non-Fibrous
3C Solid White 2' x 2' Ceiling Tile	NA	NA	NA	Sample negative for ACM. Sample content: 90% Cellulose 10% Non-Fibrous
4A Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content: 20% Cellulose 80% Non-Fibrous
4B Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content: 20% Cellulose 80% Non-Fibrous
4C Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content: 20% Cellulose 80% Non-Fibrous
4D Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content: 20% Cellulose 80% Non-Fibrous
4E Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content; 20% Cellulose 80% Non-Fibrous
4F Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content: 20% Cellulose 80% Non-Fibrous
4G Sheetrock	NA	NA	NA	Sample negative for ACM. Sample content: 20% Cellulose 80% Non-Fibrous
5A-5C Joint Compound	2 nd and 3 rd Floor Office Areas	Not Quantified	Good/Fair	Sample positive for ACM. Sample content: 2% Chrysotile 98% Non-Fibrous
6A-6C Textured Wall Material	3 rd Floor Stairwell	~385 sq ft	Fair	Sample positive for ACM. Sample content: 2% Chrysotile 98% Non-Fibrous
7A-7E Brown 12" x 12" VAT	3 rd Floor Office Area	~1,670 sq ft	Poor	Sample positive for ACM. Sample content: 3% Chrysotile 97% Non-Fibrous
7AM-7EM Mastic	3 rd Floor Office Area	~1,670 sq ft	Poor	Sample positive for ACM. Sample content: 10% Chrysotile 90% Non-Fibrars

Sample # /Description	Material Location	Approximate Quantity	Observed Condition	Total Asbestos Content/Make-up
8A-7C Black 12" x 12" VAT	3 rd Floor Office Area	~120 sq ft	Good/Fair	Sample positive for ACM. Sample content: 3% Chrysotile 97% Non-Fibrous
8AM Mastic	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
8BM Mastic	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
8CM Mastic	NA	NA	NA	Sample negative for ACM. Sample content: • 2% Cellulose • 98% Non-Fibrous
9A Cove Base Molding	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
9AM Mastic	NA	NA	NA	Sample negative for ACM. Sample content: 2% Cellulose 98% Non-Fibrous
9B Cove Base Molding	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
9BM Mastic	NA	NA	NA	Sample negative for ACM. Sample content: 2% Cellulose 98% Non-Fibrous
9C Cove Base Molding	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
9CM Mastic	NA	NA	NA	Sample negative for ACM. Sample content: 2% Cellulose 98% Non-Fibrous
10A-10C Parking-side Window Glazing	2 nd and 3 rd Floor Office Areas	14 Windows (~100 lf/window)	Good/Fair	Sample positive for ACM. Sample content: 5% Chrysotile 95% Non-Fibrous
11A-11C Parking-side Window Caulking	2 nd and 3 rd Floor Office Areas	14 Windows (~23 lf/window)	Good/Fair	Sample positive for ACM. Sample content: 10% Chrysotile 90% Non-Fibrous
12A River-side Window Caulking	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
12B River-side Window Caulking	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous

Sample # /Description	Material Location	Approximate Quantity	Observed Condition	Total Asbestos Content/Make-up
12C River-side Window Caulking	NA	NA	NA	Sample negative for ACM. Sample content: • 100% Non-Fibrous
13A-13C White 12" x 12" VAT	2 nd Floor Office Area	~300 sq ft	Fair	Sample positive for ACM. Sample content: 10% Chrysotile 90% Non-Fibrous
13AM-13CM Mastic	2 nd Floor Office Area	~300 sq ft	Fair	Sample positive for ACM. Sample content: 10% Chrysotile 90% Non-Fibrous
14A-14E Transite Boards	1 st and 2 nd Floors	~2,300 sq ft	Good/Fair	Sample positive for ACM. Sample content: 30% Chrysotile 70% Non-Fibrous
15A-15C Textured Ceiling Material	2 nd Floor Office	~450 sq ft	Fair	Sample positive for ACM. Sample content: 2% Chrysotile 10% Cellulose 2% Other 86% Non-Fibrous
16A Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 10% Cellulose 90% Non-Fibrous
16B Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 10% Cellulose 90% Non-Fibrous
16C Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 10% Cellulose 90% Non-Fibrous
16D Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 80% Cellulose 20% Non-Fibrous
16E Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 80% Cellulose 20% Non-Fibrous
16F Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 85% Cellulose 15% Non-Fibrous
16G Composite Asphalt Roofing Felts	NA	NA	NA	Sample negative for ACM. Sample content: 85% Cellulose 15% Non-Fibrous

Sample # /Description	Material Location	Approximate Quantity	Observed Condition	Total Asbestos Content/Make-up
17A-17C 2 nd Floor Window Glazing	2 nd Floor Manufacturing Area	~51 Windows (~288 lf/window)	Good/Fair	Sample positive for ACM. Sample content: 2% Chrysotile 98% Non-Fibrous
18A Rolled Asphalt Roofing Shingle	NA	NA	NA	Sample negative for ACM. Sample content: 45% Cellulose 55% Non-Fibrous
18B Rolled Asphalt Roofing Shingle	NA	NA	NA	Sample negative for ACM. Sample content: 50% Cellulose 50% Non-Fibrous
18C Rolled Asphalt Roofing Shingle	NA	NA	NA	Sample negative for ACM. Sample content: 50% Cellulose 50% Non-Fibrous
19A Interior Boiler TSI	NA	NA	NA	Sample negative for ACM. Sample content: • 100% Non-Fibrous
19B Interior Boiler TSI	NA	NA	NA	Sample negative for ACM. <u>Sample content:</u> • 100% Non-Fibrous
19C Interior Boiler TSI	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
20A-20G Exterior Corrugated Transite Panels	Southeastern Warehouse portion of the Building	~10,500 sq ft	Good/Fair	Sample positive for ACM. Sample content: 30% Chrysotile 70% Non-Fibrous
21A Red Window Glazing 1 st Floor/Basement Windows	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
21B Red Window Glazing 1 st Floor/Basement Windows	NA	NA	NA	Sample negative for ACM. Sample content: • 100% Non-Fibrous
21C Red Window Glazing 1 st Floor/Basement Windows	NA	NA	NA	Sample negative for ACM. Sample content: • 100% Non-Fibrous
22A 1 st Floor/Basement Metal Framed Window Glazing	NA	NA	NA	Sample negative for ACM. Sample content: 10% Other 90% Non-Fibrous
22B 1 st Floor/Basement Metal Framed Window Glazing	NA	NA	NA	Sample negative for ACM. Sample content: 5% Other 95% Non-Fibrous

Sample # /Description	Material Location	Approximate Quantity	Observed Condition	Total Asbestos Content/Make-up
22C 1 st Floor/Basement Metal Framed Window Glazing	NA	NA	NA	Sample negative for ACM. Sample content: 5% Other 95% Non-Fibrous
23A 1 st Floor/Basement Large Wood Framed Window Glazing	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
23B 1 st Floor/Basement Large Wood Framed Window Glazing	NA	NA	NA	Sample negative for ACM. Sample content: 100% Non-Fibrous
23C 1 st Floor/Basement Large Wood Framed Window Glazing	NA	NA	NA	Sample negative for ACM. <u>Sample content:</u> • 100% Non-Fibrous
24A-24C 1 st Floor/Basement Small Wood Framed Window Glazing	1 st Floor/Basement Air Circulator Room	~3 Windows (~64 lf/window)	Good/Fair	Sample positive for ACM. <u>Sample content:</u> • 3% Chrysotile • 97% Non-Fibrous

NA - Not Applicable sq ft + Square Feet lf - Linear Feet

APPENDIX C

Glossary of Terms

ACM – An abbreviation for the term Asbestos Containing Material. Asbestos containing material is defined as any product, which contains more than one percent (1%) asbestos.

Amosite -- An asbestiform of the amphibole group, containing approximately 50% silica and 40% iron (II) oxide, and is made up of straight, brittle fibers, light gray to pale brown in color. It is often called "brown" asbestos.

Asbestos -- A generic name given to a number of naturally occurring hydrated mineral silicates that possess a unique crystalline structure, and are incombustive in air, and are, separable into filaments.

Asbestos Abatement – Procedures to control fiber release from asbestos-containing materials in buildings or to remove it entirely.

Asbestos Control – Minimizing the generation of airborne asbestos fibers until a permanent solution is developed (removal).

Asbestos Fibers – Fibers with a length to width ratio of 3:1 or more, generated from an asbestos-containing material.

Breeching – A duct, which transports combustion, gases from a boiler or heater to a chimney or stack.

Chrysotile – The only asbestiform of the serpentine variety, which contains approximately 40% each of silica and magnesium oxide. It is the most common form of asbestos, and is often called "white" asbestos.

Crocidolite – An asbestiform of the amphibole variety containing approximately 50% combined silica and nearly 40% of combined iron III. It is often called "blue" asbestos.

Electron Microscopy - A method of asbestos sample analysis, which utilizes an electron, beam to differentiate between fibers.

Encapsulation – The coating of ACM with a bonding or sealing agent to reduce or prevent the release of airborne fibers.

Enclosure – A resilient structure, built (or sprayed) around ACM designed to prevent disturbed to prevent disturbance and contain released fibers.

Friable Asbestos – Any material that contains 1% or more of asbestos by weight, volume or area percentage and can be crumbled, pulverized or reduced to powder when dry by hand pressure.

Homogenous Areas – An area, which appears similar throughout in terms of color, texture and date of material application.

Operations & Maintenance Plan (O & M) -- Specific procedures and practices developed for the interim control of asbestos-containing materials in buildings until it is removed.

Phase Contrast Microscopy (PCM) – a microscopic technique used for counting of fibers in air samples, but which does not distinguish fiber types.

Pipe Lagging – The insulation or wrapping around a pipe.

Polarized Light Microscopy (PLM) – A microscopic technique used to distinguish between different types of asbestos fibers by their shape and unique optical properties. It is utilized in bulk sampling identification.

Substrate - The material or existing surface to which the asbestos containing material is attached or applied.

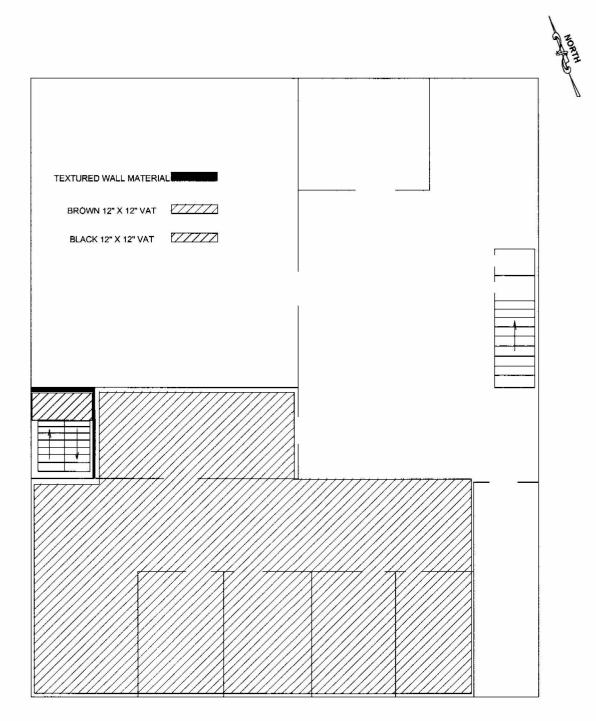
Surfactant – A chemical wetting agent added to water to improve its ability to penetrate asbestos containing material by reducing the surface tension of the water.

Visual Inspection – A visual, walk through inspection of the work area to detect incomplete work, damage or inadequate clean up of a work site.

Wet Cleaning – The process of eliminating asbestos contamination from surfaces and objects by using cloths, mops or other cleaning tools that have been dampened with amended water.

APPENDIX D

Figures





Jacques Whitford Company, Inc.

JACQUES WHITFORD LOCATION: PORTLAND MAINE REVIEWED BY: DESIGNED BY: DRAWN BY: DATE PREPARED: CHECKED BY: 1-15-04 BAP BAP

REVISION DATE: REVISION NO: DRAWN BY: CHECKED BY: REVIEWED BY: PROJECT NAME/FILE NAME: PROJECT NUMBER/PHASE: SCALE: 7 DEPOT STREET MEP03102 NTS

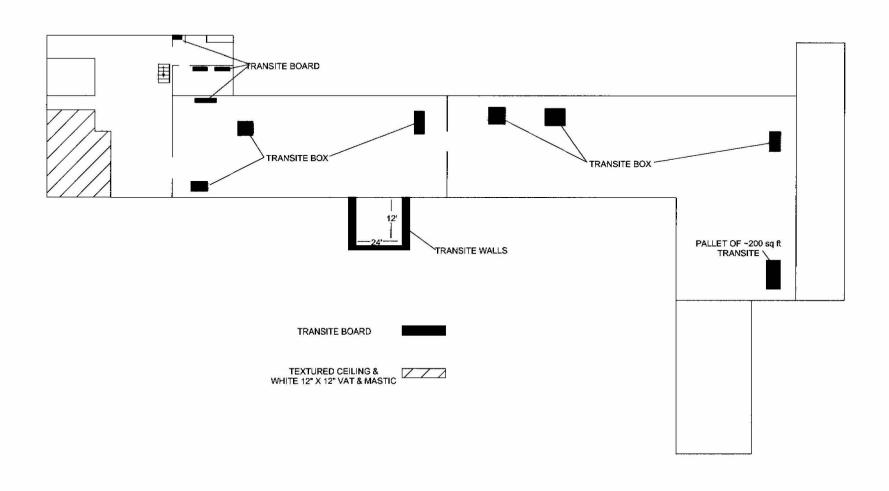
PREPARED FOR:

DRAWING TITLE:

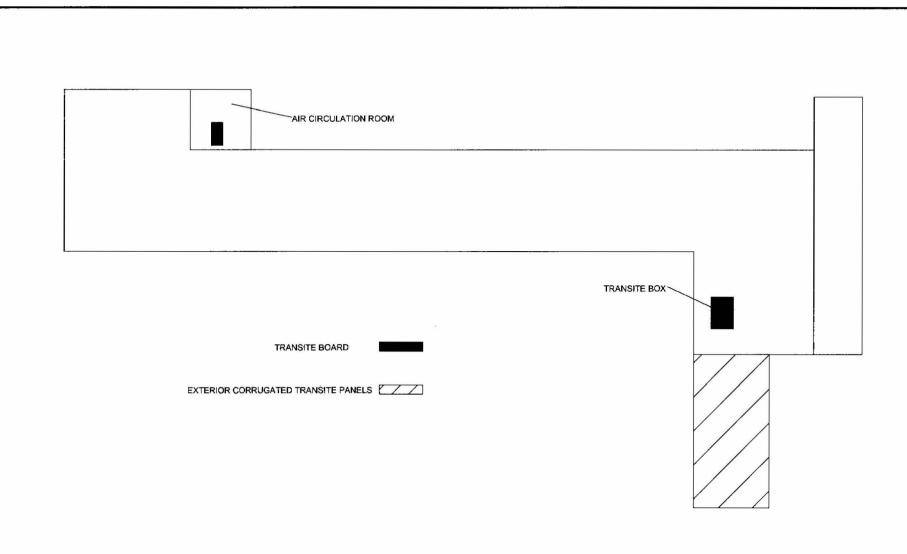
RENEE LEWIS

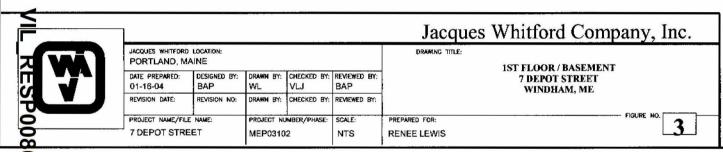
SITE PLAN
3rd FLOOR OFFICE AREA
7 DEPOT STREET

WINDHAM, ME VIL_FRESP00867



						Jacques	Whitford Company, Inc.
	JACQUES WHITFORD PORTLAND, MA					DRAWING TITLE:	2nd FLOOR
7 7 1	DATE PREPARED: 01-16-04	DESIGNED BY: BAP	DRAWN BY: WL	CHECKED BY:	REVIEWED BY: BAP		7 DEPOT STREET WINDHAM, ME
4 T	REVISION DATE:	REVISION NO:			REVIEWED BY:		FIGURE NO.
0	PROJECT NAME/FILE		PROJECT NU	IMBER/PHASE:		PREPARED FOR:	2
80	7 DEPOT STRE	ET	MEP0310	2	NTS	RENEE LEWIS	





Village at Little Falls, LLC 2 Market Street, 6th Floor Portland, ME 04101 207-772-7219

June 30, 2006

Ms. Kimberly N. Tisa, PCB Coordinator United States Environmental Protection Agency 1 Congress Street, Suite 100 – CPT Boston, MA 02114-2023

Re:

Approval for PCB Cleanup and Disposal under 40 CFR 761.61(a)

Former Keddy Mill South Windham, Maine

Dear Ms. Tisa:

Village at Little Falls, LLC (VLF) is in receipt of your letter indicating approval for PCB Cleanup and Disposal under 40 CFR 761.61(a). The letter arrived by Certified Mail and is dated June 20, 2006.

VLF understands and agrees to abide by the conditions set forth in your approval letter. These conditions include: (1) General Conditions; (2) Remedial and Disposal Conditions; (3) Inspection, Modification and Revocation Conditions; and (4) Recordkeeping and Reporting Conditions.

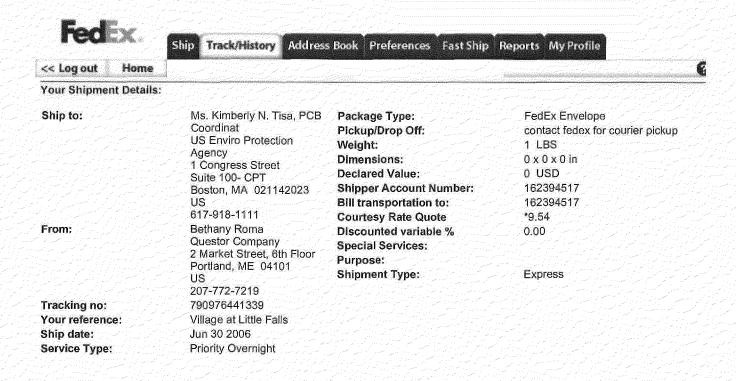
VLR appreciates your timely review and approval of Phase I of the planned PCB cleanup program.

Sincerely,

Village at Little Falls, LLC

Manager

Return t



Please Note

Print

*The courtesy rate shown here may be different than the actual charges for your shipment. Differences may occur based on actual weig dimensions, and other factors. Consult the applicable <u>FedEx Service Guide</u> or the FedEx Rate Sheets for details on how shipping charcalculated.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdimisinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is I greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary ve.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within stric Consult the applicable FedEx Service Guide for details.

VIL_RESP00871



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 Congress Street, Suite 1100 BOSTON, MA ,02114-2023

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUN 2 0 2006

Ms. Renee Lewis Village at Little Falls, LLC 2 Market Street, 6th Floor Portland, Maine 04101

Re: Approval for PCB Cleanup and Disposal under 40 CFR §761.61(a)

Former Keddy Mill South Windham, Maine

Dear Ms. Lewis:

This is in response to your application for approval of a proposed PCB cleanup plan for the property known as the former Keddy Mill, located at 7 Depot Street, South Windham, Maine (the Site)¹. PCB contamination exceeding the allowable PCB levels under the federal PCB regulations at 40 CFR §761.61 has been identified in various materials at the Site, including dirt/debris, dried sludges, oily materials, concrete and fuel oil piping. Given the quantity of the miscellaneous materials scattered through the former mill building, you have proposed a phased approach to assess and cleanup the PCB contamination at the Site in the following manner:

- ➤ Phase I: Removal and off-site disposal of dried sludge, dirt/debris, oily material, and associated fuel piping. These wastes and associated decontamination wastes will be disposed of as a greater than (>) 50 parts per million (ppm) *PCB remediation waste*.
- ➤ Phase II: Assessment of the building interior *porous surfaces*, including concrete, brick, and wood. A separate PCB remedial plan will be submitted to address *PCB* remediation waste identified during this phase.
- ➤ Phase III: Assessment of soil located exterior to and beneath the Site building. A partial building demolition is proposed to access the soils beneath the building. A separate PCB remedial plan will be submitted to address *PCB remediation waste* identified during this phase.

¹ Information was submitted on your behalf by Ransom Environmental Consultants, Inc, and was provided to satisfy the notification requirement under CFR §761.61(a). Information was provided dated November 22, 2005 and April 28, 2006. These submissions will be referred to as the "Application."

Given the current Site conditions, your proposed approach is reasonable for purposes of completing the assessment of the Site and developing separate plans to address identified PCB contaminated materials. The proposed cleanup and disposal of the PCB-contaminated materials from the Site under the Phase I activities meet the self-implementing cleanup and disposal requirements under 40 CFR §761.61(a)(5). Accordingly, EPA is approving your Application and you may proceed with the Phase I PCB cleanup and off-site disposal activities under 40 CFR §761.61(a) and the Application, subject to this Approval and the conditions of Attachment 1.

EPA will not consider the Phase I project complete until it has received all submittals required under this Approval. Should you have any questions on this matter, please contact Kimberly Tisa at (617) 918-1527.

Sincerely,

Robert W. Varney

Regional Administrator

Attachment 1

cc:

T. Coffin, Ransom

N. Hodgkins, MEDEP

T. Plante, Town of Windham

File

ATTACHMENT 1: PCB CLEANUP AND DISPOSAL APPROVAL FORMER KEDDY MILL 7 DEPOT STREET, SOUTH WINDHAM, MAINE

GENERAL CONDITIONS

- 1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. §2605(e), and the PCB regulations at 40 CFR Part 761. This Approval applies solely to the Phase I activities and to the *PCB remediation waste* identified in the Application under the Phase I activities.
 - a. This Approval requires an assessment of potential PCB contamination at the Site following Phase I activities. The Village at Little Falls, LLC (VLF) shall conduct an assessment of potential PCB contamination both indoors and outdoors and shall submit a cleanup plan for EPA review and approval. In the alternative, VLF shall submit documentation that cleanup of this property is not required under TSCA and the federal PCB regulations at 40 CFR Part 761. This does not preclude the applicability of any state requirements by the Maine Department of Environmental Protection.
- 2. VLF shall conduct on-site activities in accordance with the conditions of this Approval and with the Application.
- 3. This Approval shall be revoked if the EPA does not receive written notification of VLF's acceptance of the conditions of this Approval within 10 business days of receipt.
- 4. In the event that the activities described in the Application differ from the conditions specified in this Approval, the conditions of this Approval shall govern.
- 5. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR §761.3 unless otherwise defined within this Approval.
- 6. VLF must comply with all applicable federal, state and local regulations, including the storage, handling, and disposal of all PCB wastes, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, VLF shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
- 7. VLF is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time VLF has or receives information indicating that it or any other person has failed, or may have failed, to comply with any provision of this Approval, VLF must report the information to EPA in writing within 24 hours of having or receiving the information.

- 8. This Approval does not constitute a determination by EPA that the selected transporters or disposal facilities are authorized to conduct the activities set forth in the Application. VLF is responsible for ensuring that the selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
- 9. VLF shall notify EPA in writing of the scheduled date of commencement of on-site activities at least 3 business days prior to conducting any work under this Approval.
- 10. This Approval does not waive or compromise EPA's enforcement and regulatory authority, nor release VLF from any applicable requirements of federal, state or local law.

REMEDIAL and DISPOSAL CONDITIONS

- 11. Prior to initiating onsite work under this Approval, VLF shall submit the following information for EPA review and/or approval:
 - a. a certification signed by its selected remediation contractor, stating that the contractor has read and understands the Application, and agrees to abide by the conditions specified in this Approval; and
 - b. the contractor work plan detailing the specific methods for removal, handling, and disposal of PCB-containing oils that may be generated during removal of the fuel oil pipelines.
- 12. PCB waste generated as a result of the activities described in the Application, excluding any decontaminated materials, shall be marked in accordance with §761.40; stored in accordance with §761.65; and, disposed of in accordance with 40 CFR §761.61(a)(5), unless otherwise provided below:
 - a. Non-liquid cleaning materials, such as PPE and similar materials resulting from decontamination, shall be disposed of in accordance with 40 CFR §761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR §761.79(b)(3)(i)(A), §761.79(b)(3)(ii)(A), or §761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR §761.79(b)(1) or disposed of under §761.70.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

- 13. VLF shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
- 14. Any proposed modification(s) in the plan, specifications, or information in the Application must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR §761.61(a)(3)(ii).
- 15. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
- 16. Any misrepresentation or omission of any material fact in the Application or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

- 17. VLF shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup shall be established and maintained by VLF in one centralized location for a minimum of 3 years. All records shall be made available for inspection by authorized representatives of EPA.
- 18. VLF shall submit a final report to EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the remedial activities; analytical sampling results (if applicable); copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests; and copies of certificates of disposal or similar certifications issued by the disposer.

19. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
1 Congress Street, Suite 1100 - CPT
Boston, Massachusetts 02114-2023
Telephares (617) 018 1527

Telephone: (617) 918-1527 Facsimile: (617) 918-0527

20. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.



Mold Questionnaire

<u>Instructions</u> : All questions must be answered. If space is insufficient, attach additional sheets of paper. Please have this application signed and dated by an owner, partner or director of the firm.
Company Name: HR-V. Masc at Little Falls LLC Property Location: 7-13 Depot St., Windham, ME
1. Describe any water infiltration incidents in the past 5 years, including roof leaks, plumbing leaks and flooding: (Any response should indicate appropriate resolution of the cause as well as qualified contractor performing required repairs.) There are some areas of water infultration uncluding windows and roof.
2. Describe any water damage mitigation and/or remediation work that has been done in the last 5 years: (Any response should indicate appropriate resolution of the cause as well as qualified contractor performing required repairs.) No multipation or remediation for water damage has been completed.
3. Have there been any complaints from occupants or residents for poor air quality or illness? NO YES If YES, Please Describe. (A YES response should indicate the discovery and resolution of the cause of the complaints as well as the use of qualified contractors for repairs.) There are no occupants or residents for poor air quality or illness?
4. Has there been any mold growth observed inside the building in the past 5 years: NO YES If yes, Please Describe. (A YES response should indicate the discovery and resolution of the cause of the growth as well a qualified cleanup contractor for performing the clean up operation.) Not that I am aware of.
5. Has there been any water damage and mold remediation claims in the past 5 years: NO YES If YES, Please Describe. (A YES response should indicate the resolution of the cause and the cleanup by qualified contractors.)



November 23, 2004

Ms. Renee Lewis 50 Monument Square, 2nd Floor Portland, Maine 04101

Re: Background Arsenic Sampling, South Windham, Maine

Dear Renee:

Ransom Environmental Consultants, Inc. (Ransom) is pleased to present this report on background arsenic sampling in South Windham, Maine. As you are aware, concentrations of arsenic in soils were detected above Maine Department of Environmental Protection (DEP) Remedial Action Guidelines (RAG) at the 7 and 13 Depot Street properties. The RAG for arsenic at residential sites is 10 mg/kg. The objective of the background arsenic testing was to evaluate whether the arsenic present at the 7 and 13 Depot Street properties is naturally occurring.

During surface soil sampling by the Jacques Whitford Company (JWC) in August 2003, arsenic concentrations at the 7 Depot Street site ranged from 11 to 22 mg/kg. Surface soil sampling by JWC in May 2004 detected arsenic at the 13 Depot Street site at concentrations of 12.8 and 15.6 mg/kg. JWC reported that the arsenic detected was likely naturally occurring.

On November 8, 2004 Ransom collected three background soil samples from the Windham Historical Society, the US Postal Service Training Center, and the South Windham Fire Department. The samples were collected from the top 6 inches of soil using a decontaminated hand trowel. Testing of the soils was conducted by Katahdin Analytical Services of Westbrook, Maine. The arsenic results are summarized below. The laboratory data is attached hereto.

¹ Report on Supplemental Site Investigation, 7 Depot Street, Windham, Maine, Jacques Whitford Company, Inc. March 9, 2004

² Phase I and Phase II Environmental Site Assessments, Former Depot Energy Company, 13 Depot Street, Windham, Maine; Jacques Whitford Company, Inc., June 17, 2004.

Sample No.	Location	Arsenic (mg/kg)
SS1	Windham Historical Socie	28.3
SS2	US Postal Service Training Center	5.1
SS3	South Windham Fire Department	24.1

Two of the three background soil samples contained arsenic at concentrations above the DEP residential RAG of 10 mg/kg. As a result, Ransom concludes that the arsenic detected at the 7 and 13 Depot Street sites is likely naturally occurring.

If you have any questions or concerns, please feel free to call.

Sincerely,

Ransom Environmental Consultants, Inc.

D. Todd Coffin, C.G.

Senior Geologist

Enclosures

046016/arsenic rpt 11 24 04





November 17, 2004

Mr. Aaron Martin Ransom Environmental 200 High St. Portland,ME 04101

RE: Katahdin Lab Number:

WU4159

Project ID:

046016

Project Manager:

Mrs. Andrea Colby

Sample Receipt Date(s):

November 08, 2004

Dear Mr. Martin:

Please find enclosed the following information:

- * Report of Analysis (Analytical and/or Field)
- * Quality Control Data Summary
- * Chain of Custody (COC)
- * Login Report

 Λ copy of the Chain of Custody is included in the paginated report. The original COC is attached as an addendum to this report.

Should you have any questions or comments concerning this Report of Analysis, please do not hesitate to contact the project manager listed above. This cover letter is an integral part of the ROA.

We certify that the test results provided in this report meet all the requirements of the NELAC standards unless otherwise noted in an attached technical narrative or in the Report of Analysis.

We appreciate your continued use of our laboratory and look forward to working with you in the future. The following signature indicates technical review and acceptance of the data.

Sincerely,

KATAHDIN ANALYTICAL SERVICES

Authorized Signature Date

VIL_RESP00881

DATA QUALIFIERS

- U Indicates the compound was analyzed for but not detected above the laboratory Practical Quantitation Limit.
- * Compound recovery outside of quality control limits.
- D Indicates the result was obtained from analysis of a diluted sample. Surrogate recoveries may not be calculable.
- E Estimated value. This flag identifies compounds whose concentrations exceed the upper level of the calibration range of the instrument for that specific analysis.
- J Estimated value. The analyte was detected in the sample at a concentration less than the laboratory Practical Quantitation Limit (PQL), but above the Method Detection Limit (MDL).
- B Organics- Indicates the analyte was detected in the laboratory method blank analyzed concurrently with the sample.

 Metals- Indicates the analyte was detected in the sample at a concentration greater than the instrument detection limit, but less than the laboratory's Practical Quantitation Level.
- N Presumptive evidence of a compound based on a mass spectral library search.
- A Indicates that a tentatively identified compound is a suspected aldol-condensation product.
- P Used for Pesticide/Aroclor analyte when there is a greater than 25% difference for detected concentrations between the two GC columns.
- MCL Maximum Contaminant Level
- NL No limit



REPORT OF ANALYTICAL RESULTS

Client:

Aaron Martin

Ransom Environmental

200 High St.

Portland, ME 04101

Lab Sample ID: Report Date:

WU4159-001 11/15/2004

PO No.:

Project:

046016

Sample Description					¥	Matrix	Percent Solids(%)		Date) Sampled		Date Received		
SS1	1					SL	79.1		11/08/20	04	11/08/2	2004	
Parameter	Result	Units	Adjusted PQL	Dilution Factor	PQL	Analytical Method	Analysis Date	Ву	Prep Method	Prepped Date	Ву	QC	Notes
ARSENIC	28.3	mg/Kg	0.7	1	0.8	SW846 6010	11/12/04	AJW	SW846 305	0 11/11/04	JWM U	K11ICS0	





Report of Analytical Results

Client: Aaron Martin

Ransom Environmental

200 High St.

Portland,ME 04101

Lab Sample ID: WU4159-1

Report Date: 16-NOV-04

Client PO:

Project: 046016

SDG: WU4159

Sample Description

SS1

<u>Matrix</u>

Date Sampled

Date Received

SL 08-NOV-04

08-NOV-04

Parameter	Result	Adj PQL	Anal. Method	QC.Batch	Anal. Date	Ву	Prep. Method	Prep. Date	Ву	Footnotes
Total Solids	79. %	.1	CLP SOW 788	WG11890	11-NOV-04	JF	CLP SOW 788	10-NOV-04	Љ	



REPORT OF ANALYTICAL RESULTS

Client:

Aaron Martin

Ransom Environmental

200 High St.

Portland, ME 04101

Lab Sample ID: WU4159-002

Report Date:

11/15/2004

PO No.:

Project:

046016

Sample Description						Matrix	Percent Solids(%)				Da Rece		
SS2		5-				\$L	75.8		11/08/20	004	11/08	/2004	
Parameter	Result	Units	Adjusted PQL	Dilution Factor	PQL	Analytical Method	Analysis Date	Ву	Prep Method	Prepped Date	Ву	QC	Notes
ARSENIC	5.1	mg/Kg	0.9	1	0.8	SW846 6010	11/12/04	AJW	SW846 305	0 11/11/04	JWM	UK11ICS0	





Report of Analytical Results

Client: Aaron Martin

Sample Description

SS2

Ransom Environmental

200 High St.

Portland, ME 04101

Lab Sample ID: WU4159-2 **Report Date:** 16-NOV-04

Client PO:

Project: 046016 SDG: WU4159

Matrix

Date Sampled

Date Received

SL

08-NOV-04

08-NOV-04

Parameter	Result	Adj PQL	Anal. Method	QC.Batch	Anal. Date	Ву	Prep. Method	Prep. Date	Ву	Footnotes
Total Solids	76. %	.I	CLP SOW 788	WG11890	11-NOV-04	JF	CLP SOW 788	10-NOV-04	JF	



REPORT OF ANALYTICAL RESULTS

Client:

Aaron Martin

Ransom Environmental

200 High St.

Portland, ME 04101

Lab Sample ID:

WU4159-003

Report Date:

11/15/2004

PO No.:

Project:

046016

Sample Description						Matrix	Percent Solids(%)		Date Sampled		Date Received		
SS3	A A A	Surger Parties No.				SL	71.2		11/08/20	004	11/08/	2004	
Parameter	Result	Units	Adjusted PQL	Dilution Factor	PQL	Analytical Method	Analysis Date	Ву	Prep Method	Prepped Date	Ву	QC	Notes
ARSENIC	24.1	mg/Kg	0.9	1	8.0	SW846 6010	11/12/04	AJW	SW846 305	0 11/11/04	JWM (JK11ICS0	-





Report of Analytical Results

Client: Aaron Martin

Ransom Environmental

200 High St.

Portland, ME 04101

Lab Sample ID: WU4159-3

Report Date: 16-NOV-04

Client PO:

Project: 046016

SDG: WU4159

Sample Description

SS3

Matrix

Date Sampled

Date Received

SL

08-NOV-04

08-NOV-04

Parameter	Result	Adj PQL	Anal. Method	QC.Batch	Anal. Date	Ву	Prep. Method	Prep. Date	Ву	Footnotes
Total Solids	71. %	.1	CLP SOW 788	WG11890	11-NOV-04	ЛF	CLP SOW 788	10-NOV-04	JF	



PREPARATION BLANK REPORT

Sample ID: PBSUK11ICS0

Batch ID UK11ICS0

Element Name	Result	Units	Flag	PQL	File
ANTIMONY	0.2	mg/kgdrywt	U	0.800	AUK12A
ARSENIC	0.3	mg/kgdrywt	U	0.800	AUK12A
BARIUM	0.02	mg/kgdrywt	U	0.500	AUK12A
BERYLLIUM	0.07	mg/kgdrywt	J	0.500	AUK12A
BORON	0.2	mg/kgdrywt	J	10.0	AUK12A
CADMIUM	0.03	mg/kgdrywt	U	1.00	AUK12A
CALCIUM	0.3	mg/kgdrywt	U	5.00	AUK12A
CHROMIUM	0.08	mg/kgdrywt	U	1.50	AUK12A
COBALT	0.06	mg/kgdrywt	U	3.00	AUK12A
COPPER	0.08	mg/kgdrywt	U	2.50	AUK12A
IRON	2.	mg/kgdrywt	J	10.0	AUK12A
LEAD	0.2	mg/kgdrywt	U	0.500	AUK12A
MAGNESIUM	0.8	mg/kgdrywt	U	5.00	AUK12A
MANGANESE	0.05	mg/kgdrywt	J	0.500	AUK12A
MOLYBDENUM	0.1	mg/kgdrywt	U	10.0	AUK12A
NICKEL	0.08	mg/kgdrywt	U	4.00	AUK12A
SELENIUM	0.4	mg/kgdrywt	U	1.00	AUK12A
SILVER	0.07	mg/kgdrywt	U	1.50	AUK12A
STRONTIUM	0.010	mg/kgdrywt	J.	10.0	AUK12A
THALLIUM	0.4	mg/kgdrywt	U	1.50	AUK12A
TIN	2.2	mg/kgdrywt	J	10.0	AUK12A
TITANIUM	0.18	mg/kgdrywt	J	1.50	AUK12A
VANADIUM	0.07	mg/kgdrywt	U	2.50	AUK12A
ZINC	0.24	mg/kgdrywt	J	2.50	AUK12A

VIL_RESP00889

U The analyte was not detected in the sample at a level greater than the instrument detection limit.

J The analyte was detected in the sample at a concentration greater than the instrument detection limit, but less than the laboratory's Practical Quantitation Level.

H The analyte was detected in the sample at a concentration greater than the laboratory's acceptance limit.